

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Anita B. Brown,

Debtor.

Case No. 19-10921-pmm

Chapter 13

Debtor's Motion to Compel Discovery Directed to Wells Fargo Bank, N.A.

AND NOW, Debtor Anita B. Brown, by and through her attorney, moves this Court to enter an order compelling discovery. In support of this motion, the Debtor states as follows:

1. On September 14, 2023, the Debtor objected to Claim No. 5 of Creditor Wells Fargo Bank, N.A. ECF No. 107.

2. On October 25, 2023, the Debtor issued a subpoena to Wells Fargo that called for production of "[a]ll documents used to prepare Proof of Claim No. 5, which was filed in the bankruptcy case of Anita Brown on April 1, 2019 (Case No. 19-10921, Eastern District of Pennsylvania)." Exhibit A.

3. Wells Fargo recently informed the Debtor that it declines to comply with the subpoena. Exhibit B.

4. Because the Debtor's subpoena was reasonable, the Court must compel Wells Fargo to comply pursuant to Fed. R. Civ. P. 37(a)(1) (applicable to this proceeding through Fed. R. Bankr. P. 7037).

5. The certification required by R. 37(a)(1) is attached as Exhibit C.

NOW, THEREFORE, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in her favor as may be necessary and proper under the law.

Date: November 21, 2023

CIBIK LAW, P.C.
Counsel for Debtor

By: /s/ Michael I. Assad
Michael I. Assad (#330937)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com